

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FTX TRADING LTD., <i>et al.</i>,¹)	Case No. 22-11068 (JTD)
)	
Debtors.)	(Jointly Administered)
)	
<hr/>)	Re: Docket No. 481

**SECOND SUPPLEMENTAL DECLARATION OF STEVEN SIMMS IN SUPPORT OF
THE APPLICATION FOR AN ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF FTI CONSULTING, INC. AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Pursuant to 28 U.S.C. section 1746, Steven Simms, declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc. (“FTI”),² an international consulting firm. On January 11, 2023, I submitted a declaration (the “Original Declaration”) in support of the *Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 22, 2022* [D.I. 481] (the “Application”).³ On February 13, 2023, I submitted a supplemental declaration (the “First Supplemental Declaration”) in support of the Application. I submit this second supplemental declaration (the “Second Supplemental Declaration”) on behalf of FTI in further support of the Application and to supplement the disclosures set forth in the Original Declaration and the First Supplemental Declaration. Except as

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Professionals employed by certain subsidiaries of FTI will also be used in the engagement.

³ Capitalized terms used herein shall have meanings ascribed to them in the Application, the Original Declaration or the First Supplemental Declaration, as applicable.

otherwise noted, I have personal knowledge of the matters set forth herein, and, if called as a witness, I would testify thereto.⁴

Supplemental Disclosure

2. The Original Declaration and the First Supplemental Declaration disclosed that FTI currently advises the Voyager Committee as its financial advisor, and that FTI will not be involved in or render any services in connection with any Recusal Matters to either the FTX Committee or the Voyager Committee. No later than two (2) business days after the filing of this Second Supplemental Declaration, FTI shall (a) separate the professional teams advising each of the FTX Committee and the Voyager Committee, respectively, and (b) establish and implement information barriers to prevent the sharing of any files and material non-public information between the two professional teams concerning the work being performed for the FTX Committee and the Voyager Committee, respectively, from and after such time. Upon the resolution of all Recusal Matters between the FTX estates and the Voyager estates, subject to the written consent of the U.S. Trustee or further order of the Court granting such relief upon a motion on notice to the U.S. Trustee and other parties-in-interest, the foregoing separation and information barriers shall no longer be required.

3. FTI will continue to update and expand its ongoing relationship search for additional parties in interest. If any additional new material relevant facts or relationship are discovered or arise, FTI will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

⁴ Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at FTI and are based on information provided by them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 14, 2023
New York, New York

/s/ Steven Simms
Steven Simms